

Exhibit 1

Robert T. Quackenboss
rquackenboss@HuntonAK.com
HUNTON ANDREWS KURTH LLP
2200 Pennsylvania Ave., NW
Washington, DC 20037
Tel: (202) 955-1950

Thomas R. Waskom (admitted *pro hac vice*)
twaskom@HuntonAK.com
Meghan A. Podolny (admitted *pro hac vice*)
mpodolny@HuntonAK.com
HUNTON ANDREWS KURTH LLP
951 East Byrd Street
Richmond, Virginia 23219
Tel: (804) 788-8403

Lukas Moffett (admitted *pro hac vice*)
lmoffett@HuntonAK.com
HUNTON ANDREWS KURTH LLP
1445 Ross Avenue, Suite 3700
Dallas, TX 75202
Tel: (214) 979-2908

Counsel for Defendant Walmart Inc.

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

JACQUELINE RAMOS and EDWIN
JOHNSON, individually and on behalf of all
others similarly situated,

Plaintiffs,

v.

WALMART INC.,

Defendant.

Case No. 2:21-cv-13827-BRM-AME

Hon. Brian R. Martinotti, U.S.D.J.
Hon. Andre M. Espinosa, U.S.M.J.

**DECLARATION OF THOMAS R. WASKOM IN SUPPORT OF DEFENDANT'S APPEAL
OF MAGISTRATE JUDGE'S DISCOVERY ORDER, OR IN THE ALTERNATIVE,
MOTION FOR JUDGMENT ON THE PLEADINGS**

I, Thomas R. Waskom, declare under penalty of perjury that the following statements are

true and correct:

1. My name is Thomas R. Waskom. I am over the age of twenty-one years. I have never been convicted of a felony. I am mentally competent to make this declaration. I have personal knowledge of the facts described herein, which are true and correct.

2. I am an attorney and partner at the law firm of Hunton Andrews Kurth LLP. I am one of the attorneys of record for Defendant Walmart Inc. (“Walmart”) in the above-captioned matter.

3. I am personally familiar with the facts of this case, and have been actively involved in the parties’ attempts to resolve written discovery issues to date. I make this declaration in support of Defendant’s Appeal of the Magistrate Judge’s Discovery Order (ECF No. 77), or in the Alternative, Motion for Judgment on the Pleadings (hereinafter, “Appeal and Motion in the Alternative for Judgment on the Pleadings”).

4. The parties raised the CHRIA statute of limitations issue with the Magistrate Judge during the July 20, 2022 status conference. Walmart ordered a transcript of the July 20, 2022 status conference wherein the issues described in this appeal were discussed, and will provide it in accordance with Local Rule 72.1(c)(1)(A) when it is received.

Dated: August 12, 2022

/s/ Thomas R. Waskom
Thomas R. Waskom